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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
 Plaintiff,

vs.

HADARI STALLWORTH,  
  
 Defendant.

**CRIMINAL INDICTMENT**

Case No.: 2:24-cr-0083-GMV-MTK

**VIOLATIONS:**

18 U.S.C. § 115(a)(1)(B): Threatening a  
 United States Judge;

18 U.S.C. § 876(c): Mailing Threatening  
 Communications; and

18 U.S.C. § 1038(a)(1)(A): False  
 Information and Hoaxes

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Threatening a United States Judge  
 (18 U.S.C. § 115(a)(1)(B))

On or about June 27, 2022, in the District of Nevada,

**HADARI STALLWORTH,**

defendant herein, did threaten to assault and kidnap Person A, a United States Judge, with  
 intent to retaliate against Person A on account of the performance of Person A's official  
 duties, to wit: STALLWORTH communicated to Person A that, among other things, he



1 would "have my people kill whatever you hold dearly first: pets, kids, grandkids,  
2 husband..." and that individuals under his control would "kidnap" and "to[r]ture" Person  
3 A, including by placing a "2-inch cut in your trachea," in violation of Title 18, United  
4 States Code, Section 115(a)(1)(B).

5 **COUNT TWO**

6 Mailing Threatening Communications  
(18 U.S.C. §876(c))

7 On or about June 27, 2022, in the District of Nevada,

8 **HADARI STALLWORTH,**

9 defendant herein, did knowingly cause to be delivered by the Postal Service, according to  
10 the directions therein, a communication addressed to Person A, a United States Judge, at  
11 the United States District Court, Clerk of the Court, 333 S. Las Vegas Blvd., Room 1334,  
12 Las Vegas, NV 89191, containing a threat to kidnap or to injure Person A, to wit:  
13 STALLWORTH communicated to Person A that, among other things, he would "have my  
14 people kill whatever you hold dearly first: pets, kids, grandkids, husband..." and that  
15 individuals under his control would "kidnap" and "to[r]ture" Person A, including by  
16 placing a "2-inch cut in your trachea," all in violation of Title 18, United States Code,  
17 Section 876(c).

18 **COUNT THREE**

19 Mailing Threatening Communications  
(18 U.S.C. §876(c))

20 On or about September 7, 2022, in the District of Nevada,

21 **HADARI STALLWORTH,**

22 defendant herein, did knowingly cause to be delivered by the Postal Service, according to  
23 the directions therein, a communication addressed to Person A, but sent to the Supreme  
24 Court of the United States at 1 First Street, N.E., Washington D.C., 20543, containing a



1 threat to injure Person A, a United States Judge, to wit: STALLWORTH communicated to  
2 Person A, among other things, that “you ...are . . . dead!” and “I’m gonna get your houses  
3 set on fire with your dead bodies still in it. Better yet, I’m gonna have them give you a  
4 paral[y]tic and you’re gonna burn rat, like a jew in the 40’s,” and that he would “kill you  
5 first,” all in violation of Title 18, United States Code, Section 876(c).

6 **COUNT FOUR**

7 False Information and Hoaxes  
(18 U.S.C. § 1038(a)(1)(A))

8 On or about September 28, 2022, in the District of Nevada,

9 **HADARI STALLWORTH,**

10 defendant herein, unlawfully, willfully, and knowingly did engage in conduct with intent to  
11 convey false and misleading information under circumstances where such information may  
12 reasonably be believed and where such information indicated that an activity had taken,  
13 was taking and will take place that would constitute a violation of Title 18, United States  
14 Code, Section 2332a(a)(2)(A)—Use of a Weapon of Mass Destruction, to wit: HADARI  
15 STALLWORTH caused a letter to be mailed to the U.S. District Court at 333 S. Las Vegas  
16 Blvd., Room 1334, Las Vegas, NV 89191 falsely informing the letter contained anthrax, in  
17 violation of Title 18 United States Code, Section 1038(a)(1)(A).

18 **COUNT FIVE**

19 False Information and Hoaxes  
(18 U.S.C. § 1038(a)(1)(A))

20 On or about September 30, 2022, in the District of Nevada,

21 **HADARI STALLWORTH,**

22 defendant herein, unlawfully, willfully, and knowingly did engage in conduct with intent to  
23 convey false and misleading information under circumstances where such information may  
24 reasonably be believed and where such information indicated that an activity had taken,



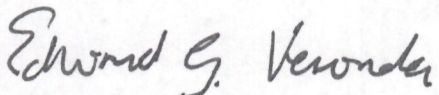
1 was taking and will take place that would constitute a violation of chapter Title 18, United  
2 States Code, Section 2332a(a)(2)(A)—Use of a Weapon of Mass Destruction, to wit:  
3 HADARI STALLWORTH caused a letter to be mailed to the U.S. District Court at 333 S.  
4 Las Vegas Blvd., Room 1334, Las Vegas, NV 89191 falsely informing the letter contained  
5 blowfish toxin, in violation of Title 18 United States Code, Section 1038(a)(1)(A).

6  
7 **DATED:** this 16<sup>th</sup> day of April, 2024

8 **A TRUE BILL:**

9 /S/  
10 FOREPERSON OF THE GRAND JURY

11 JASON M. FRIERSON  
12 United States Attorney

13   
14 EDWARD G. VERONDA  
15 Assistant United States Attorney